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FCC
Federal Communications Commission
445 12th Street, SW Room TW-B204
Washington, DC 20554

Dear FCC:

I urge you to support the merger of sirius and xmsr and request you exclude the comments made by the nab and their membership as they have proven the only interest they support is the business end of radio.

please act on behalf of the public interest.by allowing this merger. its time for the old broadcasters to pony up for high quality music content along with talent .which this merger should force them into undertaking do to the competitive nature of radio..

please dont be lead again by the same groups and owners that gave us industry consolidation in the first place.

please serve the public first, as directed by the congress.

with ibiquity being owned collectively by investors and broadcasters the comments contained here make clear satellite does compete with radio and even mentions the loss of monopoly status for the old broadcast owners/groups please put their collective words to work agaist them..

while it also mentions directly the loss of advertising revenue to satellite radio and other new forms of media.

please note the very same owners/investors/broadcasters want you to think they dont compete outside of local markets .based on the comments filed

via the nab on behalf of the broadcasters.

all of which are clearly false or mis-leading when you begin to read the related industry material.

this document states "worldwide" then "The technology has been proven on every continent and is available now. HD Radio broadcasting has seen and will see more dramatic success worldwide simply because it has features and benefits to suit all.

http://www.indiantelevision.com/headlines/y2k7/june/june307.php

Asia can take advantage of HD radio technology

Indiantelevision.com Team

(22 June 2007 2:30 pm)

SINGAPORE: HD radio technology can be low cost, easy to implement and an effective solution for all broadcast organisations, said iBiquity Digital Corporation's P. V. Priestley at BroadcastAsia in Singapore.

The technology has been proven on every continent and is available now. HD Radio broadcasting has seen and will see more dramatic success worldwide simply because it has features and benefits to suit all.

The HD Radio system operates on both AM-MW and FM VHF Band II either in a digital-only mode or in a "hybrid" digital plus analogue mode. The result is that AM stations have "FM quality" sound and FM stations can achieve "CD-like quality" audio and carry multiple audio programs streams (known also as multicasting).

iBiquity Digital Corporation is the developer of the HD Radio brand of IBOC (In-Band-On-Channel) technology. iBiquity was formed by the merger of USA Digital Radio and Lucent Digital Radio, with the goal of creating an

IBOC digital radio system.

IBOC, as the name implies, allows a digital signal to be added to the existing analogue service within a radio station's allocated AM and FM channel assignment. This simulcast mode is know as "hybrid" and applies to both AM and FM. The HD Radio hybrid mode places low-level digital carriers in the upper and lower sidebands of the analogue signal. The implementation on AM is similar in that the upper and lower sidebands contain low-level digital signals.

Since the analogue AM signal is amplitude modulated (as opposed to frequency modulated), the AM HD Radio hybrid signal can carry digital information in a quadrature phase component. Thus it can be placed directly beneath, or in quadrature to the analogue modulation.

"Radio industry executives are fond of pointing out how the medium has bounced back from past challenges. But fighting off television in the 1950s, 8-tracks in the '70s and CD's in the 90's, fades in comparison to what radio faces today. At one time radio had the monopoly on "wireless." It was the only technology to reach people in cars, on the streets, even on the beach. Today, all media is becoming wireless and portable, The medium is also fighting a competitive battle on all fronts, losing ad market share to the internet, satellite radio and all sorts of other new media," said Priestley.

Some sources forecast that internet advertising will overtake radio by 2009. The radio industry simply cannot continue to run its business the way it has in the past. Despite infectious optimism on the part of most radio operators worldwide that things are getting better, there is little solid evidence that any new marketing initiatives have the slightest potential to turn around the demand for analogue radio advertising and the radio industry's current financial status.

Radio in the FM and AM Bands is a very important medium in Asia, due to its common place at work, home and the automobile. The radio industry in Asia is growing fast because it can offer local content which provides a good platform for local brands to advertise their products in their specific locality. If operated efficiently and effectively radio,

broadcasting can be a profitable business.

Asia, Priestley said, stands on the verge of a great opportunity and is able to economically take advantage of one of the latest digital radio systems, HD Radio technology (IBOC). As the name IBOC, In-Band-On-Channel, implies, the HD Radio system operates on the existing AM Medium Wave (MW) and FM-VHF Band II. This very fact has advantages to all involved: the station's position on the dial does not change enforcing listener loyalty and for the broadcaster, there will be fewer infrastructure changes necessary and lower capital costs to implement than the other systems.

If transmission systems are of modern design HD Radio equipment can be simply, economically and quickly implemented. A very important issue to note is that if one station implements HD Radio technology, it does not automatically mean that all stations must do the same.

Radio stations can implement HD Radio technology when and how they want making this technology a much more democratic choice. When a station believes it is the right time, it can choose to move to digital.

From the listener's point of view, the existing analogue radios will still work. The listener will only need to buy a new radio when they wish to.

From the transmitter and receiver manufacturers' point of view, there is low risk and R&D investment. The equipment needed for HD radio implementation is simply an upgrade of existing know-how. Today there are numerous HD Radio receiver manufacturers in Asia including China, Indonesia, Japan, Korea, Malaysia, Thailand and Taiwan. The HD Radio receiver system design modules are available to any licensed company making it very easy for any organization to use HD Radio technology to maximize their growth with little investment.

The huge quantity of transmission systems installed to date is driving down the price of all equipment involved. The more countries the technology travels to, the lower the cost to broadcast organizations. There are over 1200 such installation to date and another 5,000 planned in the USA and Brazil alone, indicating that HD Radio technology will remain the most cost effective technology available.

Features that are currently under development include surround sound (a premium sound experience in the car as well as at home); store-and-replay (allows the ability to rewind a song that was just played or record an entire program for listening at a more convenient time); on-demand capabilities (permitting instant access to news and information); and an Electronic Program Guide (EPG) so the listener can easily review future content.

In FM HD Radio technology, supplementary channels can be added for programs like weather, traffic, a different language or a radio reading service. Datacasting is also possible and Program Associated Data (PAD), which is metadata about the program and station, are included in the standard.

The hybrid mode has an advantage. A HD Radio receiver will first lock into an analogue signal, then get into FM stereo and transition smoothly to digital. If the digital signal is lost, it will blend slowly back to analogue, the same way a car radio will blend from stereo to mono given a weak signal.

But the most likely beneficial characteristic of HD Radio technology for Asia is that it can be implemented at the pace determined by the market. And a radio station can choose the type of implementation method ideally suited to its own timeframe. This technology can be used to supplement the existing analogue radio, and can be employed in conjunction with other technologies such as DAB, DMB and DTV.

Sincerely,

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